

MARTIN DRUYAN AND ASSOCIATES ATTORNEYS

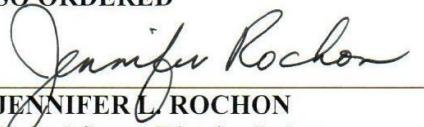
450 7th Ave
N.Y., N.Y. 10123, Suite 508
917-861-4836, 212-279-5577,
MD@Druyanlaw.com

Dec. 18, 2022

Hon. Jennifer L. Rochon
United States District Court,
Southern District of New York
500 Pearl St.
Foley Square, N.Y. , N. Y.

By ECF Filing

Request DENIED. The parties do not provide any reason or authority for "removing" the settlement agreement, filed by Plaintiff, from the docket. Nor does the Court find there is any basis to seal the agreement.

SO ORDERED

JENNIFER L. ROCHON
United States District Judge

Re: Taylor v Bronx Parent Housing , et al 21 cv 0498 JLR, Case Terminated 11/3/02

Stipulated Removal of Settlement Agreement from Docket Record

Dear Judge Rochon:

This office represents Plaintiff S. Byron, we stipulate to the Order requested herein.

Plaintiff and Def. BPHN request an Order, upon the stipulation of Counsel Brian Sokoloff for BPHN, removing the signed settlement agreement from the docket. It was filed on the docket in Dec 2022 with Plaintiff's letter motion for a pre motion conference ordering compliance with the settlement agreement. Said motion was denied by this Court.

Plaintiff advises the Court the Mr. Sokoloff/BPHN/Zurich Insurance in blatant disregard (Mr. Sokoloff's words) of the settlement agreement in this case still have not paid the settlement monies, due before 11/20/2022 to Plaintiff.

In sum, Plaintiff and Defendant BPHN request an order, upon stipulation to remove the signed settlement agreement herein from the docket filed Dec. 2022.

Thank you for the consideration of this matter.

Very truly yours,

S/ MARTIN DRUYAN ESQ.

Attorney for Plaintiff S. Byron md mm BY ECF ALL COUNSEL

Plaintiff requests a pre motion conference, or an order upon this letter motion, to reopen this terminated, discontinued case as the Defendant Bronx Parent Housing Network, represented by Brian Sokoloff, Esq. is in breach of the settlement agreement that Zurich Insurance without good reason refuses to pay the settlement damaging Plaintiff's Xmas celebration.

After SDNY mediation, the parties settlement agreement, attached, executed, stated that payment of settlement (\$65,000) would be paid in 30 calendar days from Oct. 20, 2022. To date Dec. 12, 2022, despite numerous daily letters, e mails and calls to Mr. Sokoloff lately especially since Dec. 5, 2022. and one to Zurich, there is no word of when, if ever Zurich Insurance will pay the settlement.

As I have repeated again and again to Mr. Sokoloff, Esq. and to Zurich , Plaintiff herein is victimized yet again by the Defendants (including Def. Victor Rivera who is presently incarcerated in Federal Prison for BPHN related felonies). This is most hurtful during this Holiday Season, these settlement funds are needed by Plaintiff to celebrate Xmas with her family, young children, etc.

Page 2

Plaintiff requests a pre motion conference, or an Order upon this application and Defendants opposition to be filed, reopening the case, directing Def. BPHN to pay the settlement amount as agreed upon, and for sanctions and attorney fees pursuant to Rule 11 as Defendant BPHN has multiplied the proceedings herein without good cause, and for such other relief as the Court may deem just.

Respectfully,

S/MARTIN DRUYAN ESQ.

MARTIN DRUYAN AND ASSOCIATES

ATTORNEYS FOR PLAINTIFF

Md mm

Cc Defendant Counsel

Brian Sokoloff, Esq. For Def BPHN

And Def. Counsel